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Subject: submission of comments to the 2007 Farm Bill
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I wish to provide comments on the 2007 Farm Bill. I am responding to the 6 questions offered to citizens for comment, and my comments are listed after each question.

Question 1: How should farm policy address any unintended consequences and ensure that such consequences do not discourage new farmers and the next generation of farmers from entering production agriculture?

1) Fund the Organic certification cost share program (Sec. 10606 from 2002 farm bill) at a mandatory \$2 M per year. Standardized reporting should be required for both allocations to states and actual disbursement to producers and handlers.

2) Support policies and programs that encourage growth of small and medium-sized farms, including Sustainable Agriculture Research and Education (SARE) and Value-Added Program Grants (VAPG). Funding for these programs should be expanded.

3) Fund the Beginning Farmer and Rancher Development Program, expanding it to specifically serve beginning organic farmers and ranchers. Implement the many beginning farmer and rancher provisions of the 2002 Farm Bill.

Question 2: How should farm policy be designed to maximize US competitiveness and our country's ability to effectively compete in global markets?

Emerging markets such as the organic industry should be more strongly supported. Organic agriculture has seen nearly 20% annual growth over the last decade. Various estimates place organic retail sales as being between 1.5% and 2.5% of total U.S. food sales.

1) USDA's AMS National Organic Program should comply with international standards for certification and accreditation, as defined by the International Organization for Standardization (ISO). Specifically, the USDA should comply with ISO/IEC 17011 (regarding general requirements for accreditation bodies accrediting conformity assessment bodies) and ISO Guide 65 (which specifies general requirements that a third-party operating a product or service certification system shall meet if it is to be recognized as competent and reliable). Adherence to these Programs ensures that accreditation and certification agencies operate in a consistent and reliable manner. For example, domestic and international certifiers are treated differently by USDA NOP accreditation.

2) Support increased research dollars for public varieties of plants to meet the needs of organic farmers.

Question 3: How should farm policy be designed to effectively and fairly distribute assistance to producers?

1) Restore Environmental Quality Incentives Program (EQIP) in the 2007 Farm Bill, including funds for incentive payments to transition to organic production and other environmental practices. Safeguards are needed against using EQIP to expand concentrated livestock production.

2) Restructure CSP to reward basic organic practices; cover cropping and crop rotations should be prioritized, and organic farm plans should be accepted as proof of compliance with the highest tier (III) of conservation.

3) Direct Land Grant Universities to spend an increased percentage of agriculture research dollars on organic through an amendment of the Hatch Act. Amend the Smith-Lever Act to direct Cooperative Extension to spend an increased percentage of agriculture extension dollars on organic farm initiatives and research.

Organic Research and Extension: organic producers find few information resources available to them to address production or marketing issues

specific to organic. Only since 1998 has organic research been funded at all, and it currently receives far less than a proportionate share of federal agriculture research dollars. In 2004, 3.1% of the USDA gross outlays (\$2.5 B) was used to fund research and education. Of this \$2.5 B, only about \$10 M (0.4%) went to organic specific research.

a. Fund at least a 5-fold increase in USDA-ARS resources explicitly allocated to organics. ARS should receive \$20 M mandatory funding per year for organic research, using a framework of "fair share" funding of organic agricultural research, based on the organic share of U.S. retail food sales.

b. Increase funding for the Integrated Organic Program (IOP) to \$10 M mandatory per year. Expansion of this program should focus on a higher number of smaller grants, and it should not be incorporated into the National Research Initiative. An organic program should be developed within the USDA ARS with the oversight of a National Program Leader (NPL) for Organic Agriculture.

c. IPM Centers: The USDA CSREES Integrated Pest Management Centers should have a role in expanding the USDA organic portfolio. The development of "Strategic Plans for Organic Best Management Practices" is a potential way these centers could better serve the organic sector.

d. National Research Initiative (NRI)- Organic plant and animal breeding should become a priority area within existing NRI germplasm programs.

d. Fund the USDA National Agriculture Library's Alternative Farming Systems Information Center (AFSIC) to manage the www.OrganicAgInfo.org website as a publicly available online database of research and extension information specific to organic production and marketing.

4) Fully implement the Organic Production and Marketing Data Initiative provided for in the Farm Security and Rural Investment Act of 2002 Farm Bill.

Question 4: How can farm policy best achieve conservation and environmental goals?

1) Fully fund the Conservation Security Program (CSP) as an uncapped entitlement program as stipulated in the 2002 Farm Bill. CSP should serve as a foundation for future farm policy. Shift from policies that focus on land retirement to those that emphasize on environmental stewardship on working lands. Shift from trade-distorting production subsidies to farm support based on environmental performance. (See Question 3, item 2 above)

2) Establish an NRCS point person for organic agriculture who will coordinate how organic production is treated by the USDA conservation programs and provide outreach to the organic community.

Question 5: How can Federal rural and farm programs provide effective assistance in rural areas?

1) Support individual payment limitations, thus increasing USDA investment in rural development and conservation programs.

2) Farm Bill 2007 should support policies that invest in entrepreneurial activities on farms. The USDA Value-Added Producer Grants program, which has been cut by 60% from its original funding level, should be restored.

Question 6: How should agricultural product development, marketing and research-related issues be addressed in the next farm bill?

1) Fund the National Research Initiative/Initiative for Future Agriculture and Food Systems (IFAFS) at its authorized level. Direct funds toward plant and animal breeding of varieties suited to organic systems, ecosystem management, and economic viability of small and mid-sized organic farms.

2) Establish a competitive grant program designed to fund marketing, economic and policy-related research pertinent to the organic industry. Such a grants program would be part of the USDA CSREES Integrated Organic Program and fall under the oversight of the National Program

Leader for Organic Agriculture.

3) Require labeling of all GMO products and strict liability for GMO contamination from GMO patent-holders and/or manufacturers.

Thank you for your consideration,

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